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April 29, 2025

VIA ECF

Hon. Mary Kay Vyskocil
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, N.Y. 10007

Re: *Kaitlin Lally v. Klick USA, Inc., et al.*, Civil Action No. 23-CV-10293 (MKV)
Request For Adjournment of Initial Pretrial Conference

Dear Judge Vyskocil:

This firm represents the Defendants in the above-referenced case and we write to request an adjournment of the initial pretrial conference currently set for June 11, 2025 at 11:00 AM. This is the first requested adjournment of the initial pretrial conference. Defendants make this adjournment request because mediation in this case has been scheduled for June 12, 2025, the day after the scheduled initial pretrial conference. Plaintiff 's counsel has consented to this adjournment request.

Defendants submit that it is in the best interests of efficiency and economy to adjourn the initial pretrial conference until after the mediation. Proceeding with the initial pretrial conference the day before the mediation would require that substantial work be done at considerable expense, including initial disclosures, joint pre-conference material, a joint letter and a proposed civil case management plan and scheduling order ("pre-trial materials/submissions"), which Defendants believe would be a disincentive to settle at mediation, the following day and/ or would reduce the settlement amount offered by Defendants to offset the additional expense incurred. Put another way, if this case settles in mediation, this work/expense would not be necessary. Notably, notwithstanding an adjournment of the initial pretrial conference, Defendants will still produce by May 12, 2025 the documents required by the Pilot Discovery Protocols. Of course, pre-mediation statements also will be submitted, by June 5, 2025.

Accordingly, should this case not settle at mediation, Defendants request that the initial disclosures and pre-conference material/submissions now due on June 4, 2025 be due two weeks after the mediation, on June 26, 2025, and the initial pretrial conference be adjourned accordingly.

Respectfully submitted,



Ned H. Bassen

The Initial Pretrial conference scheduled for June 11, 2025 at 11:00 AM is ADJOURNED to July 16, 2025 at 11:30 AM. The Initial Pretrial materials are due one week before the conference. No further extensions will be granted absent extraordinary circumstances.

cc: Patrick J. Walsh, Esq.
James L. Deboer, Esq.

SO ORDERED.

Date: 4/29/2025
New York, New York

Mary Kay Vyskocil
Mary Kay Vyskocil
United States District Judge